REMARKS/ARGUMENTS

After the foregoing Amendment, claims 1-5, 7-9, 11-16, and 18-25 are currently pending in this application. Claims 1, 9, 14, and 23 have been amended to clarify certain features of the present invention and correct minor typographical errors. Applicants submit that no new matter has been introduced into the application by these amendments.

Claim Rejections - 35 USC §102

Claims 1, 2, 4, 5, 7-9, 11-14, 16, and 18-25 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2003/0158836 to Venkatesh et al. (hereinafter "Venkatesh").

Venkatesh relates to a meta file system including a plurality of file system cells, such that a user views a collection of file system cells as a single meta file system (paragraphs 0010 and 0035). The methods disclosed in Venkatesh describe how to access the individual file system cells while the user only interacts with the meta file system.

For example, as shown in Figure 9, a client requests access to a file (paragraph 0061). This request is forwarded from the originating file system type (e.g., NFS or CIFS) to a meta file system manager (paragraphs 0061-0062). The meta file system manager uses a routing table to determine the data mover that

owns the requested file. If the requested file is owned by the same data mover as the meta file system manager, then this is considered a "local" access and the requested file can be directly accessed. If the requested file is owned by a different data mover, then this is considered a "remote" access (paragraph 0063).

In a remote access, as shown in Figure 10 and paragraph 0065, the metadata from the data mover that owns the file (116) needs to be transferred to the requesting data mover (115) so that the requesting data mover (115) can access the file. If the owning data mover (116) grants access to requesting data mover (115) to access the file, then the requesting data mover (115) can directly access the file without having to go through the owning data mover (116).

In regard to claim 1, the Examiner argues that Venkatesh teaches the step of redirecting the IRP from the meta-data extent to a second volume filter associated with the at least one data extent associated with the meta-data extent and cites paragraphs 0063 and 0066 of Venkatesh. Applicants respectfully disagree. According to paragraph 0066 of Venkatesh (emphasis added),

> If a data mover receives from a network client a request for <u>access to a meta file system object</u> in a file system cell that the data mover does not own, then the data mover forwards the request to the data mover that owns the file subsystem cell ....

By forwarding a request for <u>a meta file system object</u>, this portion of Venkatesh is performing the step in claim 1 of directing the IRP by the first volume filter to the appropriate meta-data extent. Furthermore, the Examiner interprets

the "volume filter" of claim 1 as a "data mover" in Venkatesh. Based on this interpretation, even the discussion in paragraph 0065 relating to remote access of a file would not result in the redirecting step of claim 1. Venkatesh contains no teaching or suggestion of the redirecting step as recited in claim 1. Because Venkatesh fails to disclose all of the elements of claim 1, claim 1 is distinguishable over Venkatesh.

In regard to claims 9, 14, and 23, Venkatesh fails to teach the concept of creating an additional IRP for each data extent affected by a first IRP. The Examiner cites paragraphs 0065 and 0067 of Venkatesh to teach this concept. Applicants respectfully disagree. As discussed above, paragraphs 0065 and 0067 of Venkatesh teach how a requesting data mover can access an object that it does not own, by requesting permission to access the object from the data mover that owns the object. Venkatesh does not create an additional IRP. Because Venkatesh fails to disclose all of the elements of claims 9, 14, and 23, claims 9, 14, and 23 are distinguishable over Venkatesh.

Claims 2, 4, 5, 7, 8, 11-13, 16, 18-22, 24, and 25 are dependent upon claims 1, 9, 14, and 23, respectively, which the Applicants believe are allowable over the cited references for the same reasons provided above.

Based on the arguments presented above, withdrawal of the 35 U.S.C. §102(e) rejection of claims 1, 2, 4, 5, 7-9, 11-14, 16, and 18-25 is respectfully requested.

Claim Rejections - 35 USC §103

Claims 3 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Venkatesh in view of well known art.

Claims 3 and 15 are dependent upon claims 1 and 14, respectively, which the Applicants believe are allowable over the cited references for the same reasons provided above.

Based on the arguments presented above, withdrawal of the 35 U.S.C. §103(a) rejection of claims 3 and 15 is respectfully requested.
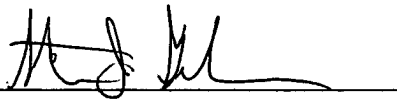
Conclusion

If the Examiner believes that any additional minor formal matters need to be addressed in order to place this application in condition for allowance, or that a telephone interview will help to materially advance the prosecution of this application, the Examiner is invited to contact the undersigned by telephone at the Examiner's convenience.

In view of the foregoing amendment and remarks, Applicants respectfully submit that the present application, including claims 1-5, 7-9, 11-16, and 18-25, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

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